



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACOB ANTHONY DAILY and
GABRIEL RODRIGUEZ,

Defendants.

ED CR No. 5:24-cr-00278-SPG

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to
Commit Bank Fraud; 18 U.S.C.
§ 1344(2): Bank Fraud and
Attempted Bank Fraud; 18 U.S.C.
§§ 982, 1028, and 1029: Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Wells Fargo Bank, N.A. ("Wells Fargo") and JP Morgan Chase
Bank, N.A. ("Chase") were financial institutions insured by the
Federal Deposit Insurance Corporation.

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1 B. OBJECT OF THE CONSPIRACY

2 2. Beginning on a date unknown to the Grand Jury and
3 continuing until on or about August 23, 2023, in Riverside County,
4 within the Central District of California, and elsewhere, defendants
5 JACOB ANTHONY DAILY and GABRIEL RODRIGUEZ conspired with each other
6 and with others known and unknown to the Grand Jury to commit Bank
7 Fraud, in violation of Title 18, United States Code, Section 1344(2).

8 C. MANNER AND MEANS OF THE CONSPIRACY

9 3. The object of the conspiracy was carried out, and was to be
10 carried out, in substance, as follows:

11 a. Co-conspirators would task defendant RODRIGUEZ with
12 recruiting individuals to open bank accounts for the purpose of
13 depositing stolen checks.

14 b. Defendant RODRIGUEZ would identify and refer defendant
15 DAILY to contact co-conspirators for the purpose of opening bank
16 accounts.

17 c. Defendant DAILY would open a Chase business account in
18 the name of Daily Printing Co LLC (the "Daily Printing Account") to
19 deposit stolen checks.

20 d. Defendant DAILY would obtain stolen checks that had
21 been altered to be made payable to Daily Printing Co LLC.

22 e. Without permission from the check's intended
23 recipient, defendant DAILY would deposit the altered checks via ATMs
24 into the Daily Printing Account.

25 f. Defendant DAILY would withdraw funds from the Daily
26 Printing Account in smaller amounts for his benefit and the benefit
27 of co-conspirators, including defendant RODRIGUEZ.

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1 D. OVERT ACTS

2 4. On or about the following dates, in furtherance of the
3 conspiracy and to accomplish its object, defendants DAILY and
4 RODRIGUEZ, together with others known and unknown to the Grand Jury,
5 committed the following overt acts, among others, within the Central
6 District of California, and elsewhere:

7 Overt Act No. 1: On an unknown date prior to February 16,
8 2023, defendant RODRIGUEZ recruited defendant DAILY to join an online
9 chat group for the purpose of committing fraud.

10 Overt Act No. 2: On February 16, 2023, defendant DAILY opened
11 the Daily Printing Account for the purpose of engaging in fraud.

12 Overt Act No. 3: On or before March 1, 2023, a co-conspirator
13 stole a \$235,870 check written by the Charleston County Treasurer
14 made out to a third-party (the "Charleston County Check").

15 Overt Act No. 4: On March 1, 2023, defendant DAILY deposited
16 the Charleston County Check, which had been altered to reflect Daily
17 Printing Co LLC as the payee, into the Daily Printing Account an ATM
18 in Lake Elsinore, California.

19 Overt Act No. 5: On March 13, 2023, defendant DAILY, assisted
20 by defendant RODRIGUEZ, withdrew approximately \$36,198 in funds, at a
21 casino in Pala, California, from the Daily Printing Account that had
22 been fraudulently deposited via the Charleston County Check.

23 Overt Act No. 6: On April 13, 2023, defendant DAILY attempted
24 to deposit a stolen check in the amount of \$112,062 that had been
25 altered to reflect a Daily Printing Co LLC as the payee, into the
26 Daily Printing Account.

COUNTS TWO AND THREE

[18 U.S.C. §§ 1344(2), 2(a), 2(b)]

[DEFENDANT DAILY]

5. The Grand Jury re-alleges paragraphs 1, 3, and 4 of this Indictment as if fully set forth herein.

A. THE SCHEME TO DEFRAUD

6. Beginning on a date unknown to the Grand Jury and continuing until on or about August 23, 2023, in Riverside County, within the Central District of California, and elsewhere, defendant JACOB ANTHONY DAILY, together with others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and with the intent to defraud, devised, participated in, and executed or attempted to execute a scheme to obtain moneys, funds, credits, assets, and other property owned by and in the custody and control of Wells Fargo and Chase Bank by means of materially false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

7. The scheme operated as set forth in paragraph 3 of this Indictment, which is incorporated here.

B. THE EXECUTION OF THE FRAUDULENT SCHEME

8. On or about the following dates, in Riverside County, within the Central District of California, and elsewhere, defendant DAILY committed and willfully caused others to commit the following acts, each of which constituted an execution or attempted execution of the fraudulent scheme:

COUNT	DATE	ACT
TWO	3/1/2023	Execution: Deposited a stolen check in the amount of \$235,870 that had been altered to reflect Daily Printing Co LLC as the payee into a Chase Bank account controlled by defendant DAILY via an ATM in Lake Elsinore, California.
THREE	4/13/2023	Attempted Execution: Attempted to deposit a stolen check in the amount of \$112,062 that had been altered to reflect Daily Printing Co LLC as the payee into a Chase Bank account controlled by defendant DAILY via an ATM in Lake Elsinore, California.

FORFEITURE ALLEGATION

[18 U.S.C. § 982]

1 Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
2 Procedure, notice is hereby given that the United States of America
3 will seek forfeiture as part of any sentence, pursuant to Title 18,
4 United States Code, Section 982(a)(2), in the event of the
5 defendant's conviction of the offenses set forth in any of Counts One
6 Through Three of this Indictment.
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9 2. The defendant, if so convicted, shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting, or derived from, any proceeds
13 obtained, directly or indirectly, as a result of the offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 18, United States Code, Section 982(b), the
19 defendant, if so convicted, shall forfeit substitute property, up to
20 the total value of the property described in the preceding paragraph
21 if, as the result of any act or omission of said defendant, the
22 property described in the preceding paragraph, or any portion
23 thereof: (a) cannot be located upon the exercise of due diligence;
24 (b) has been transferred, sold to or deposited with a third party;
25 (c) has been placed beyond the jurisdiction of the court; (d) has

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1 been substantially diminished in value; or (e) has been commingled
2 with other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5
6 /s/
Foreperson

7
8 E. MARTIN ESTRADA
9 United States Attorney

10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division



13 SCOTT M. GARRINGER
14 Assistant United States Attorney
Deputy Chief, Criminal Division

15 IAN V. YANNIELLO
16 Assistant United States Attorney
Chief, General Crimes Section

17 BENEDETTO L. BALDING
18 Assistant United States Attorney
Deputy Chief, General Crimes Section

19 ALEXANDER S. GORIN
20 Assistant United States Attorney
21 Cyber and Intellectual Property
Crimes Section